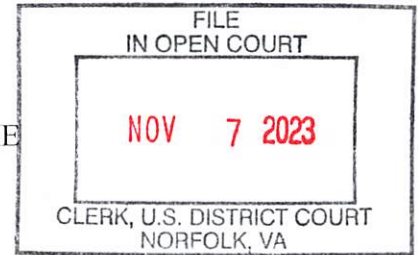


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA

v.

KEITH R. WILLIAMS,

Defendant.

Case No. 2:23-cr-106

STATEMENT OF FACTS

The United States and the defendant, KEITH R. WILLIAMS (hereinafter, “the defendant” or WILLIAMS), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. After a spate of thefts from blue collection boxes in Chesapeake, Virginia, on the evening of July 24, 2023, the United States Postal Inspection Service (“USPIS”) placed a GPS tracker inside a package, and placed the package in a blue collection box at the United States Postal Service (“USPS”) Great Bridge post office on South Battlefield Boulevard in Chesapeake, Virginia, in the Eastern District of Virginia.

2. At approximately 5:08AM on July 25, 2023, alerts from the GPS tracker indicated that the parcel was in motion. Surveillance cameras at the Great Bridge post office showed a black four-door sedan with its lights off exiting the post office’s parking lot at the same time that the tracker began to move. The USPIS also discovered thefts from two other USPS post offices in Chesapeake in the early morning hours of July 25, 2023: the Indian River post office on Indian River Road and the Chesapeake Main post office on South Battlefield Boulevard. Surveillance cameras at the Indian River post office depicted an individual later identified as WILLIAMS using a key to open the mailbox at approximately 4:10AM.

Handwritten signature in blue ink, appearing to be "J. C. Williams", with the initials "ENR" written below it.

3. Using the location data from the GPS tracker, the USPIS located pieces of opened mail in a dumpster on North Hampton Boulevard in Norfolk, Virginia. Surveillance footage showed a black Nissan Sentra sedan with North Carolina license plates—later identified as a rental vehicle—pull up to the dumpster at approximately 5:50AM on July 25, 2023. An individual later identified as WILLIAMS, who was wearing rubber gloves, took mail from the Sentra and deposited it in the dumpster. USPIS retrieved the mail and contacted senders of the mail, which included a law firm and a veterinary hospital, who confirmed they had mailed the items from the Great Bridge Post Office on the evening of July 24, 2023.

4. Later in the morning on July 25, 2023, USPIS located the Sentra in the parking lot of a nearby hotel. Visible through the Sentra's windows were multiple packages on the rear passenger floorboard. USPIS contacted a sender of the mail, J.L., who confirmed he had mailed the packages from the Chesapeake Main Post Office the prior evening.

5. Throughout the day on July 25, 2023, WILLIAMS was observed with several unindicted co-conspirators, including UC-1, in the Sentra and inside the hotel. USPIS obtained search warrants for the Sentra and WILLIAMS' hotel room, and executed the search warrants on July 26, 2023.

6. WILLIAMS was in the hotel room with UC-1. In the room in plain view were numerous checks stolen from the Great Bridge, Indian River, and Chesapeake main post office locations, along with "check stock," which is paper used to create new counterfeit checks. There were approximately 61 stolen checks and 1 W-2 form from approximately 39 different victims; the checks totaled approximately \$169,416.70. Also located in a bag in the hotel room was a USPS key, which is a large key with a serial number issued in a series which corresponds with specific zip codes. Each key series was capable of opening various types of mail receptacles in

Handwritten signature and initials, possibly "All" and "ERG", in the bottom right corner.

specific areas including blue collection boxes and apartment panel mailboxes. The keys are carried by USPS workers, including mail carriers. The specific key located in WILLIAMS and UC-1's hotel room was for opening mail receptacles in the City of Chesapeake, and had previously been reported lost by a USPS worker.

7. In the Sentra, USPIS found J.L.'s packages previously seen, and burglary tools and gloves. After being advised of his *Miranda* rights, WILLIAMS agreed to speak with agents. He claimed he was homeless, was trying to make some money, and came from either South Carolina or North Carolina. He denied involvement in the mail fraud scheme, but eventually acknowledged driving the Sentra to Hampton Roads and being responsible for the vehicle.

8. The evidence and investigation confirm that on or about July 26, 2023, in the City of Norfolk and elsewhere in the Eastern District of Virginia, the defendant, KEITH R. WILLIAMS, did buy, receive, conceal, and unlawfully have in his possession a letter, postal card, package, bag, mail, and an article and thing contained therein, which was stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted.


9. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

10. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By: _____


E. Rebecca Gantt
Assistant United States Attorney

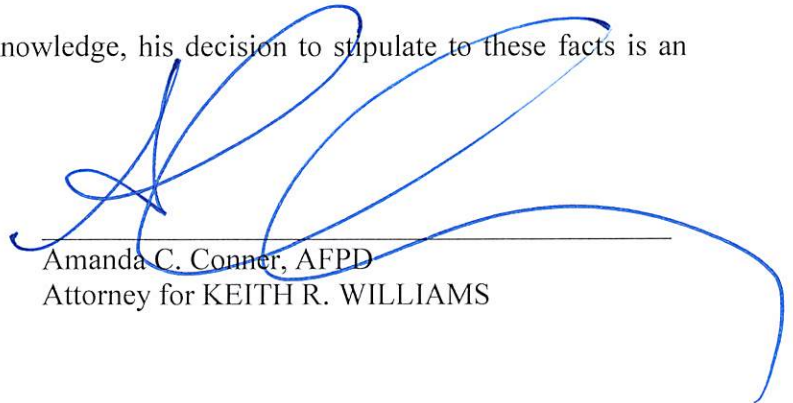

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, KEITH R. WILLIAMS, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



KEITH R. WILLIAMS

I am Amanda Conner, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Amanda C. Conner, AFD
Attorney for KEITH R. WILLIAMS


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